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*Counsel for the Official Committee of Equity Security Holders of
USA Capital First Trust Deed Fund, LLC*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:
USA COMMERCIAL MORTGAGE COMPANY
Debtor

) BK-S-06-10725-LBR
) Chapter 11
)

In re:
USA CAPITAL REALTY ADVISORS, LLC,
Debtor

) BK-S-06-10726-LBR
) Chapter 11
)

In re:
USA CAPITAL DIVERSIFIED TRUST DEED FUND, LLC,
Debtor

) BK-S-06-10727-LBR
) Chapter 11
)

In re:
USA CAPITAL FIRST TRUST DEED FUND, LLC,
Debtor.

) BK-S-06-10728-LBR
) Chapter 11
)

In re:
USA SECURITIES, LLC,
Debtor.

) BK-S-06-10729-LBR
) Chapter 11
)

Affects

- ☐ All Debtors
☐ USA Commercial Mortgage Co.
☐ USA Securities, LLC
☐ USA Capital Realty Advisors, LLC
☐ USA Capital Diversified Trust Deed
☒ USA First Trust Deed Fund, LLC

) DATE: February 15, 2007
) TIME: 9:30 a.m.
)

**STIPULATION RE MOTION BY THE OFFICIAL COMMITTEE OF EQUITY
SECURITY HOLDERS OF USA CAPITAL FIRST TRUST DEED FUND LLC TO
ESTIMATE AN ADEQUATE RESERVE FOR UNLIQUIDATED AND DISPUTED
CLAIMS IN ORDER TO PERMIT FURTHER DISTRIBUTIONS TO FTDF
MEMBERS (HALSETH)**

The undersigned, the Official Committee of Equity Security Holders of USA Capital

1 First Trust Deed Fund, LLC (the "FTDF Committee"), by and through their counsel, Candace
 2 C. Carlyon, Esq., of the law firm of Shea & Carlyon, Ltd.; and claimant, Halseth Family Trust
 3 Totally Restated 4/21/00 ("Halseth"), by and through Daniel R. Halseth, Trustee, stipulate as
 4 follows:

5
 6 1. Halseth has filed a secured claim (claim no. 146) in the amount of
 7 "\$ _____" (the "Halseth Claim").

8 2. The FTDF Committee has requested that, on an interim basis, the Court set a
 9 reserve for unliquidated claims, in order to permit the Debtor to recommence interim
 10 distributions to all equity holders of FTDF.

11
 12 IT IS HEREBY AGREED THAT:

13 1. Halseth agrees to the establishment of an interim reserve as requested in the
 14 motion.

15 2. The parties agree that the amount of such reserve shall be \$60,000 on account
 16 of the Halseth Claim.

17 3. All of the parties to this stipulation agree and understand that this is an interim
 18 measure, which will have no effect on the ultimate allowance, disallowance, priority, amount,
 19 or other treatment of the claim which are the subject of this stipulation.
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26 ///

Feb 13 07 08:14a Daniel R. Halseth

970-247-8471

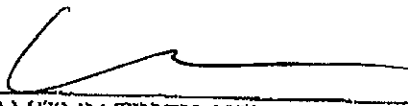
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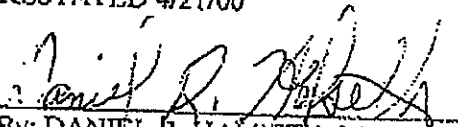
4. Counsel for FTDF has advised the claimant that FTDF does plan to object to the allowance of its claim, via a separate objection.

DATED this 21 day of February, 2007.

SHEA & CARLYON, LTD.

HALSETH FAMILY TRUST TOTALLY
RESTATED 4/21/00


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By: DANIEL R. HALSETH, TRUSTEE

and

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